



SQUARE D COMPANY
Schneider Electric

1717 CENTER PARK ROAD, P.O. BOX 80667, LINCOLN, NE 68501-0667 402-423-6721

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FEB 29 2000

RESP

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ARCM/ENSV

U.S. Environmental Protection Agency, Region VII
Federal Building
210 Walnut Street, Room 473
Des Moines, IA 50309-2109
Attention: Gary R. Witkovski

Mr Gary R. Witkovski,

Attached are the responses to the three items identified during your compliance evaluation inspection on February 8th, 2000.

1.) Contingency Plan and all revisions must be submitted to the Director

An updated copy of the contingency plan will be submitted to the Director by 3/1/00.

2.) Hazardous waste storage containers must be inspected weekly.

The logs for the hazardous waste storage container inspections indicate that two of the log sheets were dated 1/6/00 and a log sheet was missing for the week of 12/26/99 through 1/1/00.

The two log sheets dated 1/6/00 have different quantities of F006 waste storage, one sheet indicates 4 bags and the other sheet indicates 5 bags of sludge at final storage. A review of the hazardous waste database found the following information:

<u>Number of bags at final storage</u>	<u>Date moved to final storage</u>
3	12/08/99
4	12/21/99
5	01/06/00

I was on vacation from 12/22/99 through 01/03/00, however I did come into the plant to perform the hazardous waste inspection in the time period between 12/26/99 and 12/29/99. To the best of my knowledge it appears that I forgot to sign and date the log immediately following the inspection. When I pulled out the paperwork to perform the weekly inspection on 01/06/00, I came across the unsigned inspection sheet and signed and dated the log at that time. Upon performing the inspection on 01/06/00 I immediately signed and dated the inspection sheet, thereby creating two inspection sheets with the same date and a missing inspection sheet for the week of 12/26/99 through 1/1/00. In the future I will attempt to always sign and date the inspection sheets immediately following the inspection, this should eliminate any confusion going forward.

3.) Employees not receiving annual training.

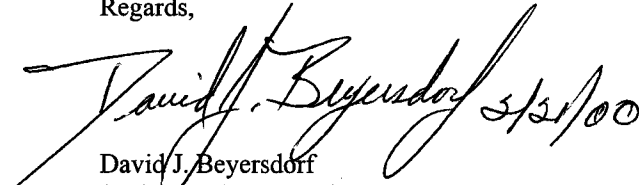
Employees that handle the hazardous waste did receive annual RCRA training in 1997 and 1998. The emergency coordinators did receive annual contingency plan training by completing the 8 hour hazardous waste and emergency response operation refresher training, however they did not receive site specific training on the contingency plan in 1999. I became responsible for the RCRA training program in 1999 and I developed a new program for the training of the employees, however I did not get it implemented prior to the end of the year. I have completed the new training program and I will train all employees that handle the hazardous waste and the emergency coordinators with the new training program by 3/31/00. I will then re-train these same employees between 9/1/00 and 10/31/00 and maintain annual RCRA training thereafter. You received copies



of the training program that was developed for the 1999-2000 RCRA training. If there are any items you feel are not covered adequately in the training program I would appreciate it if you could bring them to my attention so that they could be included in the program.

I appreciate your time and effort in inspecting our facility and making us aware of the above deficiencies. If you have any questions concerning any of the above issues please contact me at (402) 421-4009.

Regards,

A handwritten signature in black ink, reading "David J. Beyersdorf" followed by the date "5/21/00". The signature is written in a cursive, flowing style.

David J. Beyersdorf
Senior Environmental Engineer
Square D Company